

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
PUBLIC EMPLOYEE RELATIONS BOARD**

TEAMSTERS LOCAL UNION NO. 639, *et al.*,

PERB Case No. 02-U-10

Complainants,

v.

DISTRICT OF COLUMBIA PUBLIC SCHOOLS,

Respondent.

**COMPLAINANTS' MOTION *IN LIMINE* TO
EXCLUDE WITNESSES AND EXHIBITS**

Complainants Teamsters Locals 639 and 730, by their undersigned counsel, hereby move the Hearing Examiner to preclude Respondent District of Columbia Public Schools from presenting witnesses or evidence at the hearing in the above-captioned case scheduled for May 15, 2002. In support of their Motion, Complainants state as follows:

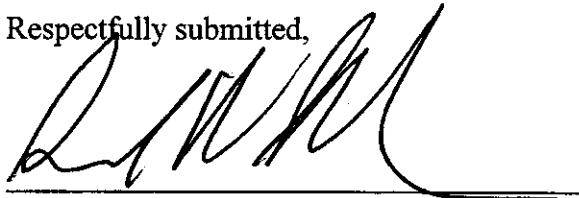
1. On March 22, 2002, PERB issued a Notice of Unfair Labor Practice Hearing scheduling this case for May 15, 2002 at 10:00 a.m.
2. PERB Rule 550.11 unequivocally requires parties to submit a witness list at least five days before the start of a hearing.
3. PERB Rule 550.7 unequivocally requires each party to make every effort to furnish copies of proposed exhibits five days before a hearing.
4. As of May 13, Respondent District of Columbia Public Schools has submitted neither a witness list nor a list of exhibits.
5. The Hearing Examiner has authority to impose procedural sanctions upon parties to serve the interests of justice. The District of Columbia Public Schools should be precluded from

introducing witnesses or exhibits. Its failure to submit witness and exhibit lists has hindered Complainants' ability to prepare cross-examination. *See Chisholm v. AFSCME District Council 20*, PERB Case Nos. 99-U-32 and 99-U-33, Opinion No. 656 (2001).

CONCLUSION

For the reasons stated herein, PERB should preclude Respondent from presenting evidence or witnesses.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. W. Gibson', is written over a horizontal line.

Richard W. Gibson
Jonathan G. Axelrod
Beins, Axelrod & Kraft, P.C.
1717 Massachusetts Avenue, N.W. Suite 704
Washington, D.C. 20036-2001
202-328-7222
202-328-7030 (telecopier)

Counsel for the Complainants

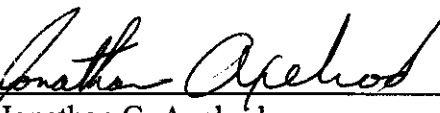
Dated: May 13, 2002

CERTIFICATE OF SERVICE

I hereby certify that one of the foregoing Motion was telecopied and that two copies were mailed, first class, postage prepaid, this 13th day of May, 2002, to:

Melissa Bennett
District of Columbia Public Schools
825 North Capitol Street, N.E.
Washington, DC 20003-4232

Veleter M. B. Mazyck, Esq.
District of Columbia Public Schools
825 North Capitol Street, N.E.
Washington, DC 20003-4232


Jonathan G. Axelrod



**DISTRICT OF COLUMBIA
PUBLIC SCHOOLS**

**Office of the Superintendent
Office of the General Counsel**
825 North Capitol Street, N.E., 9th Floor
Washington, D.C. 20002-4232
202-442-5000 Fax: 202-442-5098
www.k12.dc.us

May 17, 2002

Julio A. Castillo
Executive Director
Public Employee Relations Board
717 14th Street, N.W., 11th Floor
Washington, DC 20005

Re: Teamsters Local Nos. 639 and 730 a/w IBT, AFL-CIO v. DCPS
PERB Case No. 02-U-10

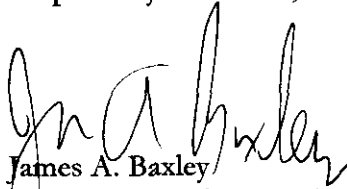
Dear Mr. Castillo:

At the Hearing in this matter conducted on May 15, 2002, Ms. Johnson directed me to submit DCPS exhibits by May 20, 2002. Accordingly, I am enclosing eight copies of each of the following exhibits:

- A - Chapter 15 of Title 5, DCMR;
- B - Pages 3716 and 3717 of the April 19, 2002 DC Register, publishing emergency rulemaking related to Chapter 15;
- C - Enlarged copies of the DCPS advertisements in the May 5 and May 12, 2002 Washington Post; and
- D - Section 1-617.08 (Management Rights) of the DC Code.

Counsel for the complainant has not objected to the admission of these documents.

Respectfully submitted,


James A. Baxley
Deputy General Counsel

Enclosures

Cc: Jonathan Axelrod, Esq. (w/encl)

CHAPTER 15 REDUCTION-IN-FORCE

Secs.	
1500	General Policy
1501	Competitive Areas
1502	Competitive Levels
1503	Reduction-in-Force Procedures for Fiscal Years 1996 and 1997
1504	Superintendent's Reassignment Option
1505	Notice Requirements
1506	Appeal of RIF Actions
1507	Furloughs

1500 GENERAL POLICY

- 1500.1 The purpose of this chapter is to establish an orderly procedure for the termination of the employment of employees of the Board of Education due to the lack of funds, lack of work, or reorganization of functions.
- 1500.2 Reduction-in-force (RIF) is a process whereby the total number of positions is reduced for one (1) or more of the following reasons:
- (a) Budgetary reasons;
 - (b) Curtailment of work;
 - (c) Reorganization of functions; or
 - (d) Other compelling reasons.
- 1500.3 All employees of the D.C. Board of Education, regardless of previous classification, are classified as educational service employees under the personnel authority of the Board of Education and shall be processed pursuant to this chapter.
- 1500.4 When used in this chapter, the following terms shall have the meanings set forth in this subsection:
- (a) Nonschool-based personnel: employees of the Board of Education who are not based at a local school or who do not provide direct services to individual students;
 - (b) School-based personnel: employees of the Board of Education who are based at a local school or who provide direct services to individual students;

- (c) School administrators: principals, assistant principals, school program directors, coordinators, instructional supervisors, and support personnel of the Board of Education;
- (d) Days: calendar days;
- (e) Encumbered position: a position which is presently filled by an employee performing an assigned function(s);
- (f) Length of service: includes service with the Board of Education, the federal government, the District of Columbia government, and the military. In addition, each employee who is a *bona fide* resident of the District of Columbia shall have added five (5) years to his or her creditable service for reduction-in-force purposes. For purposes of this section only, a nonresident District employee who was hired by the District government prior to January 1, 1980, and has not had a break in service since that date, or, a former employee of the U. S. Department of Health and Human Services at Saint Elizabeth's Hospital who accepted employment with the District government on October 1, 1987, and has not had a break in service since that date, shall be considered a District resident; and
- (g) Status: designation within a position, or within the system, such as permanent, probationary, temporary, or temporary indefinite.

1500.5 The procedures set forth in this chapter shall supersede the terms of any negotiated collective bargaining agreement in force and effect or to be negotiated for the fiscal years ending September 30, 1996 and 1997.

AUTHORITY: §2 of an Act approved June 20, 1906, 34 Stat. 317, ch. 3446, D.C. Code §31-102 (1993 Repl. Vol.).

SOURCE: Final Rulemaking published at 43 DCR 5264 (September 27, 1996).

1501 COMPETITIVE AREAS

1501.1 The Superintendent is authorized to establish competitive areas based upon all or a clearly identifiable segment of the mission, a division, or a major subdivision of the Board of Education, including discrete organizational levels such as an individual school or office. Employees in one competitive area shall not compete with employees in another competitive area.

1501.2 School-based personnel shall constitute a separate competitive area from nonschool-based personnel who shall not compete with school-based personnel for retention purposes.

SOURCE: Final Rulemaking published at 43 DCR 5264, 5265 (September 27, 1996).

1502 COMPETITIVE LEVELS

1502.1 For purposes of this section, "competitive levels" are groups, within a competitive area, consisting of all positions in the same grade or occupational level that are sufficiently alike in the following characteristics that a person could be assigned to any position without changing the terms of appointment or unduly interrupting the work program:

- (a) Qualifications;
- (b) Requirements;
- (c) Duties;
- (d) Responsibilities;
- (e) Pay schedules; and
- (f) Working conditions.

1502.2 Nonschool-based personnel or school administrators shall not be assigned or reassigned to the same competitive level as classroom teachers.

SOURCE: Final Rulemaking published at 43 DCR 5264, 5266 (September 27, 1996).

1503 REDUCTION-IN-FORCE PROCEDURES FOR FISCAL YEARS 1996 AND 1997

1503.1 An employee who encumbers a position which is abolished shall be separated in accordance with this chapter notwithstanding date of hire or prior status in any other position.

1503.2 If a decision must be made between employees in the same competitive area and competitive level, the following factors, in support of the purposes, programs, and needs of the organizational unit comprising the competitive area, with respect to each employee, shall be considered in determining which position shall be abolished:

- (a) Significant relevant contributions, accomplishments, or performance;
- (b) Relevant supplemental professional experiences as demonstrated on the job;
- (c) Office or school needs, including: curriculum specialized education, degrees, licenses or areas of expertise; and
- (d) Length of service.

1503.3 Employees separated pursuant to this section shall be entitled to severance pay in an amount to be determined by the Superintendent. The following shall be included in computing creditable service for severance pay:

- (a) Four (4) years for an employee who qualifies for veteran's preference; and
- (b) Three (3) years for an employee who qualifies for residency preference under this chapter.

SOURCE: Final Rulemaking published at 43 DCR 5264, 5266 (September 27, 1996).

1504 SUPERINTENDENT'S REASSIGNMENT OPTION

- 1504.1 As an option to separation, the Superintendent may reassign an employee who is subject to separation, subject to the provisions in this chapter.
- 1504.2 Employees separated under a reduction-in-force may be offered vacant positions, subject to the provisions in this chapter.
- 1504.3 The filling of a vacant position is discretionary and the Superintendent need not fill any vacancy that he or she may elect to keep vacant.

SOURCE: Final Rulemaking published at 43 DCR 5264, 5267 (September 27, 1996).

1505 NOTICE REQUIREMENTS

- 1505.1 An employee selected for separation shall be given specific written notice at least thirty (30) days prior to the effective date of the separation. The specific notice shall state specifically what action is to be taken, the effective date of the action, and other necessary information regarding the employee's status and appeal rights.
- 1505.2 An employee may also be given a written general notice prior to a separation due to a reduction-in-force but such general notice is not required. The general notice may be used when it is not yet determined what individual action, if any, will be taken.

SOURCE: Final Rulemaking published at 43 DCR 5264, 5267 (September 27, 1996).

1506 APPEAL OF RIF ACTIONS

- 1506.1 RIF actions shall be appealed pursuant to the provisions of this section.
- 1506.2 Neither the establishment of a competitive area smaller than this agency, nor the determination that a specific position is to be abolished, nor separation pursuant to this chapter shall be subject to review except as follows:
 - (a) An employee may file a complaint contesting a determination or a separation pursuant to Title XV of the Comprehensive Merit Personnel Act (D.C. Code §1-616.1) of §303 of the Human Rights Act of 1977 (D.C. Code §1-2543). Complaints filed pursuant to Title XV shall be filed in the D.C. Superior Court and those filed pursuant to the Human Rights Act with the D.C. Office of Human Rights; and

- (b) An employee may file with the Office of Employee Appeals an appeal contesting that the separation procedures of §§1503 and 1505 were not properly applied.

1506.3 An appeal or complaint shall be in writing and shall include the following:

- (a) The identity of the employee and the agency;
- (b) The nature and the effective date of the action appealed; and
- (c) A statement of the reasons the employee believes the action appealed is improper.

SOURCE: Final Rulemaking published at 43 DCR 5264, 5267 (September 27, 1996).

1507 FURLOUGHS

- 1507.1 An employee may be furloughed if at the time of the furlough the Superintendent intends to recall the employee to duty, to the position from which furloughed, within one (1) year.
- 1507.2 Furloughs shall be limited to one (1) year or less.
- 1507.3 A decision to furlough may be due to either curtailment of work, reorganization of functions, budgetary, or other compelling reasons.
- 1507.4 The determination regarding furlough shall be made by the Superintendent.
- 1507.5 If all employees who are furloughed from the same competitive level and competitive area are not to be recalled at the same time, the Superintendent shall establish the method by which employees are returned.
- 1507.6 If furloughed employees remain surplus at the expiration of the furlough period, a notice of separation by reduction-in-force shall be issued without the necessity for the employee's return to duty.
- 1507.7 Where it is known sufficiently in advance that a furloughed employee's services will not be required, furloughed employees may be given the required notice of separation by reduction-in-force while still in a furlough status.
- 1507.8 The provisions of §§1505 and 1506 shall be applicable to furloughed employees.
- 1507.9 To avoid a break in service, employees shall be carried in a leave-without-pay status during the time of a furlough.
- 1507.10 Life insurance and health insurance benefits shall continue uninterrupted during the period of furlough.
- 1507.11 Although annual and sick leave shall continue to be accrued during periods of furlough, no employee shall use accrued sick leave or annual leave during a period of furlough.

1507.12 If any gross salary is earned during a pay period in which a furlough is effected, deductions for taxes, retirement, tax-shelter annuities, and health and life insurance benefits shall be made.

1507.13 The period of a furlough shall be credited as part of an employee's service computation date for the purpose of calculating the employee's eligibility for retirement and for purposes of subsequent reductions-in-force (if applicable).

SOURCE: Final Rulemaking published at 43 DCR 5264, 5268 (September 27, 1996).

DISTRICT OF COLUMBIA BOARD OF EDUCATION

NOTICE OF EMERGENCY AND PROPOSED RULEMAKING

The Board of Education, pursuant to the authority set forth in D.C. Code §2-501, et seq., D.C. Law 1-19, as amended by subsequent legislative action, hereby gives notice of emergency and proposed rulemaking action taken by the Board at its meeting held on March 20, 2002, to amend Chapter 15 of the Board Rules regarding Reduction-in-Force, by modifying various sections, adding a new Section 1505, and renumbering subsequent Sections. These amendments are necessary to create a more effective process for reductions-in-force.

The emergency is necessitated by the need to (1) quickly move forward with the central office transformation for budgetary reasons, and (2) reorganize functions to provide a more efficient and effective central administration. The emergency rulemaking took effect on March 20, 2002, following approval by the Board of Education. It shall expire within 120 days of its effective date or upon publication of a Notice of Final Rulemaking in the *D.C. Register*, whichever occurs first. The Board also gives notice of its intent to recommend final rulemaking action to adopt this emergency and proposed rulemaking in not less than thirty (30) days from publication of this notice in the *D.C. Register*.

Amend Section 1500.5 as follows:

1500.5 The procedures set forth in this chapter shall supersede the terms of any negotiated collective bargaining agreement in force and effect or to be negotiated for the fiscal year ending September 30, 2002, and subsequent fiscal years.

Amend Section 1503.3 as follows:**1503 REDUCTION-IN-FORCE PROCEDURES FOR FISCAL YEAR 2002 AND SUBSEQUENT FISCAL YEARS**

1503.3 Where an entire competitive level within a competitive area is eliminated, these factors need not be considered in determining which positions will be abolished.

Renumber Current Section 1503.3 as 1503.4**Add New Section 1505 as follows:****1505 JOB SHARING, REDUCED HOURS AND REEMPLOYMENT PRIORITY CONSIDERATION**

1505.1 The Superintendent is authorized to consider job sharing and reduced hours as alternatives to separating employees pursuant to this chapter.

EXHIBIT**B**

- 1505.2 The Superintendent is authorized to establish and implement procedures that govern priority consideration for reemployment of separated employees.
- 1505.3 Nothing in this section shall either grant separated employees a right to be reemployed or grant current employees a right to job sharing or reduced hours.

Renumber Current Sections 1505 -1507 as 1506-1508

Amend New Section 1507.2 as follows:

- 1507.2 Neither the establishment of a competitive area smaller than this agency, nor the determination that a specific position is to be abolished, nor separation pursuant to this chapter shall be subject to review except as follows:
- (a) An employee may file a complaint contesting a determination or a separation pursuant to Subchapter XV of the Comprehensive Merit Personnel Act (D.C. Code §1-615.01, et seq.) or §303 of the Human Rights Act of 1977 (D.C. Code §2-1403.03). Complaints filed pursuant to Subchapter XV shall be filed in the D.C. Superior Court, and those filed pursuant to the Human Rights Act with the D.C. Office of Human Rights; and
 - (b) An employee may file with the Office of Employee Appeals an appeal contesting that the separation procedures of §§1503 and 1506 were not properly applied.

Written comments on the emergency and proposed rulemaking are invited from interested citizens. Such comments should be addressed to Ms. Paula Perelman, Executive Director, D.C. Board of Education, 825 North Capitol Street, N.E., Suite 9108, Washington, D.C. 20002. Copies of this rulemaking are available from the Office of the Board of Education by calling (202) 442-4289.

children first

The Transformation of DC Public Schools



Paul L. Vance, Superintendent

The District of Columbia Public Schools (DCPS) is in the midst of one of the most exciting and aggressive urban school reform efforts in the nation. Share in the excitement of transforming DCPS and seize the opportunity to become an integral part of this cutting-edge reform effort. Join DCPS's educational leadership team. The challenge will allow you to touch the future of public education in America, and shape the direction of urban education in one of the most distinguished and influential cities in the world. If you are a frontrunner in educational reform with talent, experience, knowledge and a proven record of achievement, then DCPS is the place for you. Be among other frontrunners contributing to the educational success of children in the nation's capital, as these professionals transform the school district into a national model of academic excellence.

When you join the DCPS team, you will become a member of a school system committed to developing inspired learners who excel academically and socially in dynamic schools that instill confidence and generate enthusiasm throughout the District of Columbia's many diverse communities. You will work under the leadership of an experienced and nationally acclaimed school superintendent with a heralded record of successful educational reform. You will work with a team of educational leaders and administrators who are directing significant change in the academic achievement of children. You will share your experiences and expertise in leveling the academic playing field for children in the District of Columbia. Furthermore, you will have the unique opportunity to establish partnerships and collaborate with some of the most influential educational, political, business and government leaders in the world.

Located in the heart of the nation's capital, DCPS features a multicultural population of students, teachers, principals, families and communities in a cosmopolitan blend of grand monuments, museums, historical landmarks and federal government complexes -- a virtual classroom experience for anyone who is chosen to become a part of DCPS.

DCPS is interested in complementing its existing leadership team with professionals who have established leadership skills, vision, creativity and a sincere desire to transform the lives of children. DCPS is interested in those with a commitment to quality, an appreciation for cultural diversity and the ability to help lead the District of Columbia Public Schools into a position of unparalleled educational prominence.

Search the listings below to find the position that best suits your qualifications and experience. To apply, individuals must submit a DC Government Application (DC2000) or a current resume and cover letter citing the position work title, vacancy number and complete ranking factors to the District of Columbia Public Schools, Office of Human Resources, 6th floor, 825 North Capitol Street, NE, Washington, DC 20002. ATTN: Recruitment Services. For more information, visit the DCPS website at www.k12.dc.us. The application deadline is May 31, 2002.

EXHIBIT

C

Medicare beginning salary range for executive level positions RM, LW, SW, PW pay plans reflect pay at step one

Office of the Superintendent

Position	Series	Grade	Pay Plan	Salary	Vacancy Assessment	Number
Executive Assistant	301	15	EG	\$72,498-93,441	02-SUP-001	
Board Liaison	301	14	EG	\$64,102-82,617	02-SUP-002	
Staff Assistant	301	13	EG	\$54,246-69,906	02-SUP-003	
Staff Assistant	301	12	EG	\$45,629-58,770	02-SUP-004	
Management & Program Analyst	343	12	EG	\$45,629-58,770	02-SUP-005	
Receptionist	304	8	EG	\$28,711-36,939	02-SUP-006	
Management & Program Assistant	344	7	EG	\$26,044-33,485	02-SUP-007	
Management & Program Assistant	344	6	EG	\$23,580-30,254	02-SUP-008	

Office of the Chief of Staff (Phase I)

1	Program Analysis Officer	343	15	EG	\$72,498-93,441	02-COS-001
1	Administrative Officer	341	15	EG	\$72,498-93,441	02-COS-002
1	Staff Assistant	301	12	EG	\$45,629-58,770	02-COS-003

Office of the Superintendent

1	Associate Superintendent for Schools and Transformation	Senior Executive	EX	\$104,030	02-CAS-040
1	School Transformation Officer	341	14	EG	\$64,102-82,617
1	Hearing Officer (Equal Opportunity Specialist)	360	14	EG	\$64,102-82,617
1	Assistant Divisional Superintendent (Senior High Schools)	Senior Executive	EX	\$99,030	02-COS-006
1	Assistant Divisional Superintendent (K-8th Grade)	Senior Executive	EX	\$99,030	02-COS-006
1	Central Office Clerk	303	6	EG	\$23,580-30,254
1	Parent Partnership Officer	301	15	EG	\$72,498-93,441
1	School Performance Officer	343	15	EG	\$72,498-93,441
1	Staff Assistant	301	11	EG	\$38,068-49,038

Office of Academic Achievement

1	Director, Quality Management	1810	15	EG	\$72,498-93,441	02-COS-011
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Division of Policy Development

1	Director of Policy Development	343	15	EG	\$72,498-93,441	02-COS-012
1	Director Intergovernmental Affairs	343	15	EG	\$72,498-93,441	02-COS-013

Office of the Chief of Staff (Phase II)

Office of Student Services

1	Administrative Officer	341	14	EG	\$64,102-82,617	02-COS-014
1	Staff Assistant	301	11	EG	\$38,068-49,038	02-COS-015
1	Staff Assistant-Student Hearings	303	10	EG	\$34,651-44,638	02-COS-016
1	Special Education Student Hearings Coordinator	1720	12	EG	\$45,629-58,770	02-COS-043
1	Assistant Hearings Coordinator	344	10	EG	\$34,651-44,638	02-COS-045
1	Central Office Clerk	303	7	EG	\$26,044-33,485	02-COS-019
1	Closed Records Receptionist	304	8	EG	\$28,711-36,939	02-COS-020

School Health

1	Supervisory Public Health Advisor	685	13	EG	\$54,246-69,906	02-COS-017
1	Central Office Clerk	303	6	EG	\$23,580-30,254	02-COS-018

Student Residency

1	Student Residency Coordinator	301	12	EG	\$45,629-58,770	02-COS-021
1	Student Residency Assistant Coordinator (Bilingual)	303	9	EG	\$31,572-40,680	02-COS-022

Intervention

1	Director, Intervention Services	101	15	EG	\$72,498-93,441	02-COS-023
1	Management and Program Assistant	344	7	EG	\$26,044-33,485	02-COS-024
1	Staff Assistant	301	9	EG	\$31,572-40,680	02-COS-025
2	Attendance Intervention Coordinator	101	12	EG	\$45,629-58,770	02-COS-042

Student Affairs

1	Student Affairs Coordinator	301	12	EG	\$45,629-58,770	02-CAO-046
1	Administrative Aide	303	8	EG	\$28,711-36,939	02-COS-027

Summer School

1	Director of Summer School Museum	1420	13	EG	\$54,246-69,906	02-COS-028
1	Exhibit Specialist	1010	11	EG	\$38,068-49,038	02-COS-029
1	Exhibit Specialist	1010	9	EG	\$31,572-40,680	02-COS-030

Transitory Services

1	Director, Transitory Services	1720	15	EG	\$72,498-93,441	02-COS-031
1	Education Program Specialist-Homesless Program	1720	13	EG	\$54,246-69,906	02-COS-032
1	Education Program Specialist-Migrant Education	1720	13	EG	\$54,246-69,906	02-COS-033
1	Secretary	318	5	EG	\$21,276-27,295	02-COS-034
2	Central Office Clerk	303	6	EG	\$23,580-30,254	02-COS-035

Athletics

1	Athletics Director	301	6	ET	\$62,746-86,432	02-COS-038
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Office of School Security

1	Executive Director of School Security	080	16	EG	\$84,945-109,515	02-COS-039
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Division of Civil Rights and Multicultural Affairs

1	Director of Civil Rights and Multicultural Affairs	160	15	EG	\$72,498-93,441	02-COS-036
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Office of the General Counsel

1	General Counsel	Senior Executive	EX	\$118,450	02-OGC-001	
1	Deputy General Counsel	805	16	EG	\$84,945-109,515	02-OGC-002
1	Supervisory Attorney-Advisor	805	15	EG	\$72,498-93,441	02-OGC-003
1	Administrative Officer	341	13	EG	\$54,246-69,906	02-OGC-004
1	Legal Services Specialist	801	14	EG	\$64,102-82,617	02-OGC-005
2	Attorney-Advisor	805	14	EG	\$64,102-82,617	02-OGC-006
4	Attorney-Advisor	805	13	EG	\$54,246-69,906	02-OGC-007

No. of Positions	Work Title	Series	Grade	Pay Plan	Salary	Vacancy Assessment	Number
1	Attorney-Advisor	805	12	EG	\$45,629-58,770	02-OGC-008	
1	Staff Assistant	301	11	EG	\$38,068-49,038	02-OGC-009	
1	Paralegal Specialist	850	11	EG	\$38,068-49,038	02-OGC-010	
2	Paralegal Specialist	850	10	EG	\$34,651-44,638	02-OGC-011	
1	Legal Assistant	885	9	EG	\$31,572-40,680	02-OGC-012	
1	Legal Assistant	885	8	EG	\$28,711-36,939	02-OGC-013	

Office of Communications

1	PA Specialist	341	14	EG	\$64,102-82,617	02-COM-02C	
1	Administrative Officer	341	13	EG	\$54,246-69,906	02-COM-001	
1	IT Specialist (Internet/Web)	2210	12	EG	\$45,629-58,770	02-COM-002	
1	Visual Information Specialist	1084	11	EG	\$38,068-49,038	02-COM-003	
1	Staff Assistant	301	11	EG	\$38,068-49,038	02-COM-004	
1	Photographic Specialist	1060	11	EG	\$38,068-49,038	02-COM-005	
1	Administrative Aide	303	7	EG	\$26,044-33,485	02-COM-006	

Office of Media and School Board Communications

1	Supervisory Public Affairs Specialist	1035	14	EG	\$64,102-82,617	02-COM-007	
1	Writer-Editor	1082	12	EG	\$45,629-58,770	02-COM-008	
1	Publications Editor	1082	12	EG	\$45,629-58,770	02-COM-009	
2	Public Affairs Specialist	1035	11	EG	\$38,068-49,038	02-COM-010	

Office of Community and Business Relations

1	Supervisory Public Affairs Specialist	1035	14	EG	\$64,102-82,617	02-COM-011	
1	Public Affairs Specialist	1035	12	EG	\$45,629-58,770	02-COM-012	

Office of Public Relations

1	General Manager	1071	15	EG	\$72,498-93,441	02-COM-013	
1	Program Director	1071	14	EG	\$64,102-82,617	02-COM-014	
3	Video/Photographer-Editor	1080	11	EG	\$38,068-49,038	02-COM-015	
1	Graphic Designer	1084	11	EG	\$38,068-49,038	02-COM-016	
2	Producer	1071	9	EG	\$31,572-40,680	02-COM-017	

Information Center (Information and Referral Center)

1	Supervisory Information Receptionist (Call Center Manager)	301	12	EG	\$45,629-58,770	02-COM-018	
2	Information Resource Specialist	301	9	EG	\$31,572-40,680	02-COM-019	

Office of Human Resources

1	Administrative/Program Officer	341	15	EG	\$72,498-93,441	02-OHR-001	
1	Staff Assistant	301	11	EG	\$38,068-49,038	02-OHR-002	
1	Staff Assistant (Correspondence Controller)	301	9	EG	\$31,572-40,680	02-OHR-003	
1	Human Resource Assistant	203	8	EG	\$28,711-36,939	02-OHR-004	

Office of ADA/EEO Compliance

1	EEO/ADA Compliance Assistant	361	8	EG	\$28,711-36,939	02-OHR-005	
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Office of Policy Development/Benefits Administration

1	Human Resource Specialist (Benefits Administration)	343	13	EG	\$54,246-69,906	02-OHR-006	
1	Human Resource Specialist (Policy & Insurance)	343	13	EG	\$54,246-69,906	02-OHR-012	
1	Human Resource Specialist (Policy & Compensation/Class)	343	12	EG	\$45,629-58,770	02-OHR-007	
1	Human Resource Assistant	203	8	EG	\$28,711-36,939	02-OHR-008	

Office of Labor/Management Partnerships

1	Supervisory Human Resource Specialist	203	15	EG	\$72,498-93,441	02-OHR-009	
1	Human Resource Assistant	203	8	EG	\$28,711-36,939	02-OHR-010	

Office of Workforce Development

1	Supervisory Human Resource Specialist	201	15	EG	\$72,498-93,441	02-OHR-006	
2	Human Resource Specialist (Workforce Development)	201	13	EG	\$54,246-69,906	02-OHR-007	
3	Human Resource Specialist (Workforce Development)	201	12	EG	\$45,629-58,770	02-OHR-011	
1	Human Resource Specialist (Workforce Development)	201	11	EG	\$38,068-49,038	02-OHR-012	
2	Human Resource Assistant	203	8	EG	\$28,711-36,939	02-OHR-013	

Office of Academic Credentials

1	Human Resource Specialist (Education Licensing & Certification)	201	13	EG	\$54,246-69,906	02-OHR-022	
1	Human Resource Specialist (Education Accreditation)	201	13	EG	\$54,246-69,906	02-OHR-023	
1	Human Resource Specialist	201	12	EG	\$45,629-58,770	02-OHR-014	
2	Human Resource Assistant	203	8	EG	\$28,711-36,939	02-OHR-015	

Office of Labor/Employer Relations

1	Supervisory Human Resource Specialist	201	15	EG	\$72,498-93,441	02-OHR-006	
2	Human Resource Specialist (Labor Relations)	201	13	EG	\$54,246-69,906	02-OHR-016	
1	Human Resource Specialist (Labor Relations)	201	12	EG	\$45,629-58,770	02-OHR-017	
1	Human Resource Assistant	203	8	EG	\$28,711-36,939	02-OHR-018	

Office of Recruitment Services

1	Human Resource Specialist (Recruiter)	201	13	EG	\$54,246-69,906	02-OHR-019	
2	Human Resource Specialist (Recruiter)	201	12	EG	\$45,629-58,770	02-OHR-020	
1	Human Resource Specialist	201	11	EG	\$38,068-49,038	02-OHR-021	
1	Human Resource Assistant	203	8	EG	\$28,711-36,939	02-OHR-022	

Human Resource Services Center

1	Supervisory Human Resource Specialist	201	15	EG	\$72,498-93,441	02-OHR-006	
1	Human Resource Assistant (Administrative)	203	8	EG	\$28,711-36,939	02-OHR-023	
2	Supervisory Human Resource Specialist	201	14	EG	\$64,102-82,617	02-OHR-024	
1	Human Resource Specialist (Workflow Administrator)	201	13	EG	\$54,246-69,906	02-OHR-025	
4	Human Resource Specialist	201	12	EG	\$45,629-58,770	02-OHR-026	
4	Human Resource Specialist	201	11	EG	\$38,068-49,038	02-OHR-027	
2	Human Resource Assistant	203	8	EG	\$28,711-36,939	02-OHR-028	

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The Transformation of DC Public Schools



Dr. Paul L. Vance, Superintendent

Vacancies continued

No. of Removes	Work Title	Series	Grade	Pay Plan	Salary	Vacancy Announcement Number	No. of Removes	Work Title	Series	Grade	Pay Plan	Salary	Vacancy Announcement Number
1	Supervisory Human Resource Assistant (Services/Records Mgr)	203	8	EG	\$31,572-40,680	02-OHR-016	1	Transportation Specialist	2101	11	EG	\$38,068-49,038	02-CAO-00
2	Human Resource Assistant (Records/Fingerprinting, ID Badges)	203	8	EG	\$26,711-36,939	02-OHR-017	1	Education Specialist (Early Childhood Education)	1720	11	EG	\$38,068-49,038	02-CAO-00
3	Human Resource Assistant (Records/Receptionist)	203	7	EG	\$26,044-33,485	02-OHR-018	1	Program Specialist (Compensatory Education)	1701	11	EG	\$38,068-49,038	02-CAO-00
	Human Resource Assistant (Records, Maintenance, File, Verification)	203	6	EG	\$23,580-30,254	02-OHR-019	1	Staff Assistant	301	9	EG	\$31,572-40,680	02-CAO-00
	Supervisory Human Resource Specialist (Technology)	201	15	EG	\$72,498-93,441	02-OHR-008A	1	Transportation Assistant	301	8	EG	\$26,711-36,939	02-CAO-00
	Information Technology Specialist (Workflow)	201	14	EG	\$64,102-82,617	02-OHR-020	1	Clerk (Data Entry)	2102	7	EG	\$26,044-33,485	02-CAO-01
	Information Technology Specialist (Web/Graphics)	201	11	EG	\$38,068-49,038	02-OHR-021	2	Secretary	303	5	EG	\$21,276-27,295	02-CAO-01
	Office of Instructional Technology						1	Executive Director	1701	15	EG	\$72,498-93,441	02-CAO-11
	Information Technology Specialist	2210	9	EG	\$31,572-40,680	02-CAO-11	1	Information Technology Specialist	2210	7	EG	\$26,044-33,485	02-CAO-11
	Secretary/Business Manager	318	7	EG	\$26,044-33,485	02-CAO-11	1	Secretary	318	5	EG	\$21,276-27,295	02-CAO-11
	Office of the Chief Academic Officer (Phase 1)						1	Executive Director	1701	15	EG	\$72,498-93,441	02-CAO-11
	Program Officer	343	15	EG	\$72,498-93,441	02-CAO-001	2	Program Coordinator	1701	13	EG	\$54,629-58,770	02-CAO-11
	Administrative Officer	341	15	EG	\$72,498-93,441	02-CAO-002	1	Grants Developer	1701	11	EG	\$38,068-49,038	02-CAO-12
	Staff Assistant	303	10	EG	\$34,851-44,836	02-CAO-003	1	Administrative Officer	341	11	EG	\$38,068-49,038	02-CAO-12
	Office of Standards & Curriculum						1	Budget Analyst	560	12	EG	\$45,629-58,770	02-CAO-12
	Executive Director	1701	12	EG	\$45,629-58,770	02-CAO-004	1	Research Specialist	1730	11	EG	\$38,068-49,038	02-CAO-12
	Program Assistant	0318	7	EG	\$26,044-33,485	02-CAO-005	1	Data Specialist	1730	11	EG	\$38,068-49,038	02-CAO-12
	Content Specialist-Elementary Reading	1720	14	EG	\$64,102-82,617	02-CAO-006	3	Secretary	318	5	EG	\$21,276-27,295	02-CAO-12
	Content Specialist-Secondary Reading	1720	14	EG	\$64,102-82,617	02-CAO-007	1	Administrative Officer	341	12	EG	\$45,629-58,770	02-CAO-12
	Content Specialist-Elementary Math	1720	14	EG	\$64,102-82,617	02-CAO-008	1	Receptionist	304	4	EG	\$19,168-24,513	02-CAO-12
	Content Specialist-Secondary Math	1720	14	EG	\$64,102-82,617	02-CAO-009	1	Program Coordinator	1701	14	EG	\$64,102-82,617	02-CAO-12
	Content Specialist-Science	1720	14	EG	\$64,102-82,617	02-CAO-010	1	Secretary	318	8	EG	\$23,580-30,254	02-CAO-13
	Content Specialist-Social Studies	1720	14	EG	\$64,102-82,617	02-CAO-011	1	Program Development and Implementation Unit					
	Content Specialist-Art	1720	14	EG	\$64,102-82,617	02-CAO-012	1	Content Specialist-Elementary (Master Resource Teacher)	1720	14	EG	\$64,102-82,617	02-CAO-13
	Content Specialist-Music	1720	14	EG	\$64,102-82,617	02-CAO-013	1	Content Specialist-Secondary Education (Master Resource Teacher)	1720	14	EG	\$64,102-82,617	02-CAO-13
	Content Specialist-Health/Physical Education	1720	14	EG	\$64,102-82,617	02-CAO-014	1	Content Specialist-Early Childhood Education (Master Resource Teacher)	1720	14	EG	\$64,102-82,617	02-CAO-13
	Content Specialist-Media/Library	1720	14	EG	\$64,102-82,617	02-CAO-015	1	Parent, Family, and Community Support and Outreach Unit					
	Instructional Supervisor-Elementary School	1720	14	EG	\$64,102-82,617	02-CAO-016	1	Program Coordinator	1701	14	EG	\$64,102-82,617	02-CAO-13
	Instructional Supervisor-Middle/Junior High School	1720	14	EG	\$64,102-82,617	02-CAO-017	1	Intake and Assessment Unit					
	Instructional Supervisor-Senior School	1720	14	EG	\$64,102-82,617	02-CAO-018	1	Program Coordinator	1701	13	EG	\$54,629-58,770	02-CAO-13
	Office of Textbook Management						2	Program Specialist	1701	12	EG	\$45,629-58,770	02-CAO-13
	Manager	1150	9	EG	\$31,572-40,680	02-CAO-020	1	Secretary	318	5	EG	\$21,276-27,295	02-CAO-13
	Clerk	303	5	EG	\$21,276-27,295	02-CAO-021	1	Assessment Specialist	1701	9	EG	\$31,572-40,680	02-CAO-13
	Office of Early Childhood Education and Headstart						1	Assessment Specialist	1701	11	EG	\$38,068-49,038	02-CAO-14
	Director	1720	15	EG	\$72,498-93,441	02-CAO-022	1	Technical Support and Compliance Unit					
	Program Assistant	1701	12	EG	\$45,629-58,770	02-CAO-023	1	Program Coordinator	1701	12	EG	\$45,629-58,770	02-CAO-14
	Secretary	318	7	EG	\$26,044-33,485	02-CAO-025	1	Information Technology Specialist (Data Analyst)	2210	11	EG	\$38,068-49,038	02-CAO-14
	Office of Extended Day Programs, Summer and Saturday Academy						1	Clerk-Typist (Data Entry Clerk)	322	5	EG	\$21,276-27,295	02-CAO-14
	Director	1720	14	EG	\$64,102-82,617	02-CAO-026	1	Computer Assistant (Program Assistant)	335	7	EG	\$26,044-33,485	02-CAO-14
	Instructional Program Coordinator	1750	12	EG	\$45,629-58,770	02-CAO-027							

Office of the Chief Operating Officer					
Director	Senior Executive	EX	\$39,030		
Assistant Director	1701	15	EG	\$72,496-93,441	02-CAO-029
State Coordinator	1701	14	EG	\$64,102-82,617	02-CAO-030
Local School Coordinator	1701	14	EG	\$64,102-82,617	02-CAO-031
Career Guidance Coordinator	1712	14	EG	\$64,102-82,617	02-CAO-032
Marketing and Communications Coordinator	1701	14	EG	\$64,102-82,617	02-CAO-033
Budget Analyst	560	11	EG	\$38,068-49,038	02-CAO-034
Career Assessment Coordinator	1701	13	EG	\$54,246-69,906	02-CAO-035
Administrative Assistant	303	7	EG	\$26,044-33,485	02-CAO-036
Program Development Specialist	1720	13	EG	\$54,246-69,906	02-CAO-037
Clerk	303	5	EG	\$21,276-27,295	02-CAO-038
Office of Guidance Counseling					
Director	1701	15	EG	\$72,496-93,441	02-CAO-039
Elementary Education Guidance Coordinator	1701	13	EG	\$54,246-69,906	02-CAO-040
Secretary	303	7	EG	\$26,044-33,485	02-CAO-041
Office of International Programs					
Director	1701	14	EG	\$64,102-82,617	02-CAO-042
Office of Advanced Programs					
Director	1701	14	EG	\$64,102-82,617	02-CAO-043
Advanced Programs Coordinator	560	11	EG	\$38,068-49,038	02-CAO-043A

Office of the Chief Academic Officer (Phase II)

Office of Special Education					
Administrative Unit					
Assistant Superintendent	Senior Executive	EX	\$102,440		CAO-0043
Education Program Specialist	341	14	EG	\$64,102-82,617	CAO-0044
Administrative Officer	341	13	EG	\$54,246-69,906	CAO-0045
Secretary	318	7	EG	\$26,044-33,485	CAO-0046
Supervisory Computer Specialist	2210	14	EG	\$64,102-82,617	CAO-0047
Production Assistant	303	7	EG	\$26,044-33,485	CAO-0048
Information Technology Specialist	2210	12	EG	\$45,629-58,770	CAO-0049
Computer Assistant	335	7	EG	\$26,044-33,485	CAO-0050
Surrogate Parent/Child Find Specialist	1701	11	EG	\$38,068-49,038	CAO-0051
Staff Assistant	201	9	EG	\$31,572-40,680	CAO-0052
Budget Officer	560	14	EG	\$64,102-82,617	CAO-0053
Budget Analyst	561	12	EG	\$45,629-58,770	CAO-0054
Records Manager	343	11	EG	\$38,068-49,038	CAO-0055
Records Clerk	303	5	EG	\$21,276-27,295	CAO-0056
Receptionist	303	5	EG	\$21,276-27,295	CAO-0057
School Support Unit					
Executive Director	1701	16	EG	\$84,965-109,515	CAO-0058
Assistant Director	1701	14	EG	\$64,102-82,617	CAO-0059
Special Assistant	1701	13	EG	\$54,246-69,906	CAO-0060
Occupational Physical Therapy Coordinator	639	13	EG	\$54,246-69,906	CAO-0061
Social Work Coordinator	185	13	EG	\$54,246-69,906	CAO-0062
Psychology Coordinator	180	13	EG	\$54,246-69,906	CAO-0063
Speech Pathology Coordinator	665	13	EG	\$54,246-69,906	CAO-0064
Staff Assistant	301	9	EG	\$31,572-40,680	CAO-0065
Staff Assistant	301	8	EG	\$28,711-36,939	CAO-0066
Secretary	318	7	EG	\$26,044-33,485	CAO-0067
Secretary	318	6	EG	\$23,580-30,254	CAO-0068
Clerk	303	5	EG	\$21,276-27,295	CAO-0069
Compliance and Mediation Unit					
Executive Director	1701	16	EG	\$84,965-109,515	CAO-0075
Coordinator for Mediation	1801	14	EG	\$64,102-82,617	CAO-0076
Coordinator for Compliance	1801	14	EG	\$64,102-82,617	CAO-0077
Lead Legal Instruments Examiner	963	11	EG	\$38,068-49,038	CAO-0078
Legal Instruments Examiner	963	9	EG	\$31,572-40,680	CAO-0079
Staff Assistant	301	9	EG	\$31,572-40,680	CAO-0080
Staff Assistant	301	8	EG	\$28,711-36,939	CAO-0081
Support Services Assistant	318	4	EG	\$19,168-24,513	CAO-0081
Non-Public Day Programs & Charter Schools Unit					
Executive Director	1701	16	EG	\$84,965-109,515	CAO-0082
Special Assistant for Charter Schools	1720	14	EG	\$64,102-82,617	CAO-0083
Assistant Director for Non-Public Day	1720	14	EG	\$64,102-82,617	CAO-0084
Assistant Director for Interagency and Residential	1720	14	EG	\$64,102-82,617	CAO-0085
Non-Public Day Coordinator	186	13	EG	\$54,246-69,906	CAO-0086
Residential Coordinator	186	13	EG	\$54,246-69,906	CAO-0087
Interagency Coordinator	186	13	EG	\$54,246-69,906	CAO-0088
Staff Assistant	301	9	EG	\$31,572-40,680	CAO-0089
Secretary	318	7	EG	\$26,044-33,485	CAO-0093
Secretary (Data Entry)	318	5	EG	\$21,276-27,295	CAO-0099
Program Development					
Executive Director	1701	16	EG	\$84,965-109,515	CAO-0090
Assistant Director	1701	14	EG	\$64,102-82,617	CAO-0091
New Programs Coordinator	1701	13	EG	\$54,246-69,906	CAO-0092
Special Services Coordinator	1701	13	EG	\$54,246-69,906	CAO-0093
Early Childhood Education Coordinator	1720	13	EG	\$54,246-69,906	CAO-0094
Transition Coordinator	1701	13	EG	\$54,246-69,906	CAO-0095
Transition Services Specialist	1701	12	EG	\$45,629-58,770	CAO-0096

Office of the Chief Operating Officer

1	Operating Officer	Senior Executive	EX	\$107,000	02-000-
1	Administrative Officer	343	15	EG	\$72,496-93,441
1	Staff Assistant	301	12	EG	\$45,629-58,770

Chief Operating Officer-Office of Management Services

1	Executive Director	Senior Executive	EX	\$136,000	02-COO-
1	Staff Assistant	301 12	EG	\$45,629-58,770	02-COO-
1	Administrative Officer	343 13	EG	\$54,246-69,906	02-COO-

Office of Information Technology

1	Administrative Officer	341	12	EG	\$45,629-58,770	02-COO-
1	Staff Assistant	301	11	EG	\$38,068-49,038	02-COO-
Planning, Policy and Project Oversight Unit						

Planning, Policy and Project Oversight Unit

Supervisory IT Specialist (Policy, Planning & PM)	2210	15	EG	\$72,496-93,441	02-COO-
IT Specialist (Policy and Planning)	2210	13	EG	\$54,246-69,906	02-COO-
IT Specialist (Tech Acquisition & Review)	2210	12	EG	\$45,629-58,770	02-COO-

Enterprise Information Systems Division

Supervisory IT Specialist (Applications Software)	2210	15	EG	\$72,496-93,441	02-COO-
Supervisory IT Specialist (Applications Software)	2210	14	EG	\$64,102-82,617	02-COO-
Secretary (statistical assistant)	318	10	EG	\$34,651-44,638	02-COO-1
IT Clerk	303	5	EG	\$21,276-27,295	02-COO-1

Financial Systems Applications Unit

IT Specialist (Applications Software)	2210	13	EG	\$54,246-69,906	02-COO-0
IT Specialist (Applications Software)	2210	12	EG	\$45,629-58,770	02-COO-0
IT Specialist (Applications Software)	2210	11	EG	\$38,068-49,038	02-COO-0

Student/School Applications Unit

Supervisory IT Specialist (Applications Software)	2210	14	EG	\$64,102-82,617	02-COO-0
IT Specialist (Applications Software)	2210	13	EG	\$54,246-69,906	02-COO-0
IT Specialist (Applications Software)	2210	12	EG	\$45,629-58,770	02-COO-0
IT Specialist (Applications Software)	2210	11	EG	\$38,068-49,038	02-COO-0

HRM Applications Unit

IT Specialist (Applications Software)	2210	13	EG	\$54,246-69,906	02-COO-0
IT Specialist (Applications Software)	2210	12	EG	\$45,629-58,770	02-COO-0
IT Specialist (Applications Software)	2210	11	EG	\$38,068-49,038	02-COO-0

Instructional Support Management Applications Unit

IT Specialist (Applications Software)	2210	13	EG	\$54,246-69,906	02-COO-0
IT Specialist (Applications Software)	2210	11	EG	\$38,068-49,038	02-COO-0

Enterprise Center Operations Unit

IT Clerk	303	5	EG	\$21,276-27,295	02-COO-0
IT Specialist (Operating Systems)	2210	12	EG	\$45,629-58,770	02-COO-0
IT Specialist (Operating Systems)	2210	9	EG	\$31,572-40,680	02-COO-0

WAN/LAN Management Unit

IT Specialist (Customer Support)	2210	14	EG	\$64,102-82,617	02-COO-0
IT Specialist (Customer Support)	2210	12	EG	\$45,629-58,770	02-COO-0
IT Specialist (Customer Support)	2210	11	EG	\$38,068-49,038	02-COO-0

Desktop Management Unit

IT Specialist (Customer Support)	2210	12	EG	\$45,629-58,770	02-COO-0
IT Specialist (Customer Support)	2210	11	EG	\$38,068-49,038	02-COO-0
IT Specialist (Customer Support)	2210	7	EG	\$26,044-33,485	02-COO-0

Telephony Unit

Telecommunications Specialist	391	11	EG	\$38,068-49,038	02-COO-0
Telecommunications Assistant	391	9	EG	\$31,572-40,680	02-COO-0
Central Office Clerk	391	8	EG	\$28,711-36,939	02-COO-0
Central Office Clerk	318	4	EG	\$19,168-24,513	02-COO-0

Web Technologies Unit

IT Specialist (Internet)	2210	9	EG	\$31,572-40,680	02-COO-0
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CTO Special Projects

Supervisory IT Specialist (Applications Software)	2210	14	EG	\$64,102-82,617	02-COO-02
IT Specialist (Applications Software)	2210	12	EG	\$45,629-58,770	02-COO-02
IT Specialist (Customer Support)	2210	11	EG	\$38,068-49,038	02-COO-02

Office of Contracts & Acquisitions

Chief Procurement Officer	1102	15	EG	\$72,496-93,441	02-COO-0
Procurement Analyst	1102	13	EG	\$54,246-69,906	02-COO-0
Administrative Officer	341	12	EG	\$45,629-58,770	02-COO-0
Clerk	303	5	EG	\$21,276-27,295	02-COO-0

Contracting Division I

Supervisory Contract Specialist	1102	14	EG	\$64,102-82,617	02-COO-0
Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-0
Contract Specialist	1102	13	EG	\$54,246-69,906	02-COO-0
Contract Specialist	1102	12	EG	\$45,629-58,770	02-COO-0
Contract Specialist	1102	11	EG	\$38,068-49,038	02-COO-0

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The Transformation of DC Public Schools



Dr. Paul L. Vance, Superintendent

Vacancies continued

No. of Vacancies	Work Title	Series	Grade	Pay Plan	Salary	Vacancy Announcement Number	No. of Vacancies	Work Title	Series	Grade	Pay Plan	Salary	Vacancy Announcement Number
Contracting Division II							Service Unit						
1	Supervisory Contract Specialist	1102	14	EG	\$64,102-82,617	02-COO-005	2	Painter Worker	4102	7	RW	\$26,788.32	02-COO-0420A
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-006	1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-00C
2	Contract Specialist	1102	13	EG	\$54,246-69,906	02-COO-007	1	Facilities Manager (Service)	1640	14	EG	\$64,102-82,617	02-COO-0111
1	Contract Specialist	1102	12	EG	\$45,629-58,770	02-COO-008	1	Facilities Management Specialist (Housekeeping)	1640	12	EG	\$45,629-58,770	02-COO-0112
1	Contract Specialist	1102	11	EG	\$38,068-49,038	02-COO-009	6	Building Management Specialist	1176	12	EG	\$45,629-58,770	02-COO-0113
Contracting Division III (Construction)							6	Building Management Specialist	1176	11	EG	\$38,068-49,038	02-COO-0114
1	Supervisory Contract Specialist	1102	14	EG	\$64,102-82,617	02-COO-005	2	Custodial Worker Supervisor	3566	2	SW	\$28,353.73	02-COO-0115
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-006	2	Office Appliance Repair Workers	4506	9	RW	\$29,742.25	02-COO-0116
2	Contract Specialist	1102	13	EG	\$54,246-69,906	02-COO-007	1	Maintenance Mechanic (Window Shade Mechanic)	4749	8	RW	\$28,787.58	02-COO-0117
1	Contract Specialist	1102	12	EG	\$45,629-58,770	02-COO-008	1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-00C
1	Contract Specialist	1102	11	EG	\$38,068-49,038	02-COO-009	Division of Planning, Design & Construction						
Small Purchases Division							1	Staff Assistant	301	8	EG	\$31,572-40,680	02-COO-092
1	Supervisory Contract Specialist	1102	14	EG	\$64,102-82,617	02-COO-011	Budget and Programming Unit (P, D & C)						
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-006	1	Financial Manager	505	14	EG	\$64,102-82,617	02-COO-105
2	Contract Specialist	1102	11	EG	\$38,068-49,038	02-COO-009	1	Budget Analyst	500	13	EG	\$54,246-69,906	02-COO-422
1	Contract Specialist	1102	9	EG	\$31,572-40,680	02-COO-010	1	Contract Specialist	1102	11	EG	\$38,068-49,038	02-COO-167
Office of Compliance							Information Technology Unit						
1	Director of Compliance	343	15	EG	\$72,498-93,441	02-COO-409	1	Supervisory Information Technology Specialist	2210	14	EG	\$64,102-82,617	02-COO-118
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-410	1	Information Technology Specialist (Sys Admin-GIS Specialist)	2210	13	EG	\$54,246-69,906	02-COO-122
2	Auditor (Internal Auditor)	511	13	EG	\$54,246-69,906	02-COO-411	1	Information Technology Specialist	2210	12	EG	\$45,629-58,770	02-COO-168
1	Management and Program Analyst (Compliance Officer)	343	14	EG	\$64,102-82,617	02-COO-412	1	Systems Analyst	2210	13	EG	\$54,246-69,906	02-COO-169
Office of Food Services							Educational Facilities Planning Unit						
1	Management and Program Analyst (Director)	0343	15	EG	\$72,498-93,441	02-COO-036	1	Program Analyst (Supervisory Planning Manager)	343	15	EG	\$72,498-93,441	02-COO-17C
1	IT Specialist (Data Management)	2210	12	EG	\$45,629-58,770	02-COO-037	1	Program Analyst (Master Planner)	343	14	EG	\$64,102-82,617	02-COO-171
1	Secretary	0318	8	EG	\$28,711-36,939	02-COO-038	1	Statistician (Demography)	1530	13	EG	\$54,246-69,906	02-COO-172
Production Division							1	Architect (Planner)	808	13	EG	\$54,246-69,906	02-COO-174
1	Management Analysis Officer (Field Operations Manager)	0343	12	EG	\$45,629-58,770	02-COO-039	1	Architect	808	12	EG	\$45,629-58,770	02-COO-172
Food Preparation and Service Unit							Design & Construction Management Unit						
1	Training Administrator (Program Specialist)	0712	11	EG	\$38,068-49,038	02-COO-040	1	Supervisory General Engineer (Design & Engineering Manager)	801	15	EG	\$72,498-93,441	02-COO-177
6	Food Service Worker Supervisor (Food Service General Foreman)	7408	7	SW	\$35,872.10	02-COO-041	1	Architect (Architect/Design Manager)	808	14	EG	\$64,102-82,617	02-COO-128
1	Facility Manager (Mechanical Maintenance)	1640	14	EG	\$64,102-82,617	02-COO-413	1	Architect	808	13	EG	\$54,246-69,906	02-COO-129
Food Acquisition and Storage Transportation Unit							1	Architect (Architect/Interior Design)	808	12	EG	\$45,629-58,770	02-COO-127
1	Materials Handler Supervisor (Warehouse Supervisor)	6907	6	SW	\$34,306.69	02-COO-042	Engineering Unit						
1	Materials Handler Leader (Warehouse Foreman)	6907	5	LW	\$28,045	02-COO-043	1	Electrical Engineer	850	14	EG	\$64,102-82,617	02-COO-17
Program Division							1	Electrical Engineer	850	13	EG	\$54,246-69,906	02-COO-171
1	Dietician	0630	13	EG	\$54,246-69,906	02-COO-044	1	Mechanical Engineer	850	14	EG	\$64,102-82,617	02-COO-173
1	Program Management Specialist	0340	9	EG	\$31,572-40,680	02-COO-045	1	Mechanical Engineer	830	13	EG	\$54,246-69,906	02-COO-43
1	Statistic Clerk	0303	7	EG	\$26,044-33,485	02-COO-046	1	Civil Engineer	810	13	EG	\$54,246-69,906	02-COO-175
1	Program Assistant	0344	7	EG	\$26,044-33,485	02-COO-047	Project & Construction Management Unit						
2	Program Assistant	0344	5	EG	\$21,276-27,295	02-COO-048	1	Supervisory Construction Analyst (Proj and Const Management Analyst)	828	15	EG	\$72,498-93,441	02-COO-013
Budget and Accounting Division							1	Management and Program Analyst (Lead Project Manager)	343	14	EG	\$64,102-82,617	02-COO-013
1	Management & Program Analyst	0343	13	EG	\$54,246-69,906	02-COO-049	1	Management & Program Analyst (Project Manager)	343	13	EG	\$54,246-69,906	02-COO-013
1	Voucher Examiner	0540	7	EG	\$26,044-33,485	02-COO-050	2	Management & Program Analyst (Project Manager)	343	12	EG	\$45,629-58,770	02-COO-014
1	Accounting Technician	0525	6	EG	\$23,580-30,254	02-COO-051	1	Construction Analyst (Lead Construction Manager)	806	14	EG	\$64,102-82,617	02-COO-014
							1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-00C
							4	Construction Representative (Quality Assurance)	809	10	EG	\$34,651-44,638	02-COO-014C

Chief Operating Officer-Office of Federal Grants Programs

1	Executive Director	1701	Senior Exec.	EX	\$39,000	02-COO-300
1	Grants Writer	1701	13	EG	\$38,068-49,038	02-COO-301
2	Grants Developer	1701	13	EG	\$54,246-69,906	02-COO-302
1	Staff Assistant	301	9	EG	\$31,572-40,680	02-COO-303
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-304
Compliance and Monitoring Branch						
1	Program Coordinator	1701	14	EG	\$64,102-82,617	02-COO-305
1	Management and Program Analyst	343	13	EG	\$54,246-69,906	02-COO-306
1	Grants Management Specialist	501	12	EG	\$45,629-58,770	02-COO-307
3	Monitor	343	13	EG	\$54,246-69,906	02-COO-308
3	Monitor	343	12	EG	\$45,629-58,770	02-COO-309
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-310
SEA Administration and Technical Assistance Branch						
1	Program Coordinator	1701	14	EG	\$64,102-82,617	02-COO-305
1	Technical Management Prog. Analyst	343	13	EG	\$54,246-69,906	02-COO-312
2	Technical Management Prog. Assistant	301	12	EG	\$45,629-58,770	02-COO-313
SEA Allocations and Competitions Branch						
1	Program Coordinator	1701	14	EG	\$64,102-82,617	02-COO-305
1	Budget and Grants Analyst	560	13	EG	\$54,246-69,906	02-COO-315
1	Grants Management Specialist	501	13	EG	\$54,246-69,906	02-COO-316
1	Grants Management Assistant	501	11	EG	\$38,068-49,038	02-COO-317
1	Budget Analyst	560	11	EG	\$38,068-49,038	02-COO-318
1	Competitions Specialist	343	11	EG	\$38,068-49,038	02-COO-319
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-320
Reporting Branch						
1	Program Coordinator	1701	14	EG	\$64,102-82,617	02-COO-305
1	Management Specialist	343	13	EG	\$54,246-69,906	02-COO-322
1	Data Collector	1530	12	EG	\$45,629-58,770	02-COO-323
1	Data Manager	2210	13	EG	\$54,246-69,906	02-COO-324
1	Researcher	1701	13	EG	\$54,246-69,906	02-COO-325

Chief Operating Officer-Office of Facilities Management

1	Financial Manager (Fiscal Oversight Manager)	505	15	EG	\$72,498-93,441	02-COO-086
1	Accountant	510	13	EG	\$54,246-69,906	02-COO-087
1	Administrative Officer	341	12	EG	\$45,629-58,770	02-COO-088
1	Staff Assistant	301	11	EG	\$38,068-49,038	02-COO-089
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-090
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-096
1	Locksmith Supervisor	4804	11	SW	\$41,252	02-COO-183
1	Locksmith	4804	7	RW	\$26,788	02-COO-182
Division of Operations and Maintenance						
1	Staff Assistant	301	9	EG	\$31,572-40,680	02-COO-092
Budget and Programming Unit (O & M)						
1	Financial Manager O&M (Supply Management Officer)	346	13	EG	\$54,246-69,906	02-COO-093
1	Logistics Management Specialist (Logistics Assistant)	346	11	EG	\$38,068-49,038	02-COO-094
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-096
Mechanical Operations & Utilities Unit						
1	Supervisory Mechanical Engineer	830	15	EG	\$72,498-93,441	02-COO-097
1	Engineering Technician	802	12	EG	\$45,629-58,770	02-COO-100
1	Boiler Plant Operator Supervisor (Fac Ops Mgr)					
1	Boiler Operations	1640	14	EG	\$64,102-82,617	02-COO-415
1	Facility Manager (Mechanical Maintenance)	1640	14	EG	\$64,102-82,617	02-COO-098
5	Boiler Plant Equipment Mechanic (HVAC)	5309	10	RW	\$31,264.06	02-COO-416
1	Electronics Supervisor	856	13	EG	\$54,246-69,906	02-COO-099
1	Electronics Technician	856	12	EG	\$45,629-58,770	02-COO-0100
2	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-090
Environmental, Health & Safety Unit						
1	Safety and Occupational Health Manager	18	15	EG	\$72,498-93,441	02-COO-0101
1	Industrial Hygienist	690	14	EG	\$64,102-82,617	02-COO-0102
1	Codes & Compliance Officer	1801	13	EG	\$54,246-69,906	02-COO-0103
1	Management & Program Analyst (Asbestos Pgt & Contrs Mgr)	343	13	EG	\$54,246-69,906	02-COO-0104
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-090
Grounds Maintenance Unit						
1	Facility Manager (Grounds and Facilities Manager)	1640	12	EG	\$45,629-58,770	02-COO-0105
1	Pest Control Supervisor	5026	8	SW	\$37,327.26	02-COO-0106
2	Maintenance Worker Leader	4749	8	LW	\$31,021.54	02-COO-0107
1	Staff Assistant	301	8	EG	\$28,711-36,939	02-COO-090
Structural Maintenance Unit						
1	Facilities Operations Manager I (Maintenance)	1601	14	EG	\$64,102-82,617	02-COO-0108
1	Facilities Operations Manager II (Maintenance)	1601	13	EG	\$54,246-69,906	02-COO-0109
2	Boiler I	3606	7	RW	\$26,788.32	02-COO-161
1	Maintenance Mechanic Supervisor (Emergency Response Team)	4749	10	SW	\$40,303.74	02-COO-0110
5	Maintenance Worker I	4749	8	RW	\$26,287.56	02-COO-162
1	Maintenance Mechanic Supervisor (Paint & Plaster Supervisor)	4749	10	SW	\$40,303.74	02-COO-0420

Division of Realty						
1	Supervisory Realty Officer	1170	14	EG	\$64,102-82,617	02-COO-143
2	Realty Specialist	1170	12	EG	\$45,629-58,770	02-COO-144
1	Realty Specialist	1170	9	EG	\$31,572-40,680	02-COO-145
1	Accountant (Utilities Manager)	510	12	EG	\$45,629-58,770	02-COO-146

Division of Logistics						
1	Support Services Manager	342	13	EG	\$54,246-69,906	02-COO-147
1	Secretary	318	7	EG	\$26,044-33,485	02-COO-181

Printing Unit						
1	Printing Officer	1654	11	EG	\$38,068-49,038	02-COO-148
4	Offset Press Operator	4417	10	PW	\$26,436.80	02-COO-149
1	Offset Press Operator	4417	9	PW	\$26,436.80	02-COO-150

Mail Distribution Unit						
1	Mail Distribution Supervisor	305	3	SW	\$29,852.99	02-COO-151

Vehicle Unit						
1	Logistics Specialist (Fleet Manager)	346	12	EG	\$45,629-58,770	02-COO-152

Warehousing Unit						
1	Logistics Management Specialist (Technical Services Manager)	346	12	EG	\$45,629-58,770	02-COO-153
1	Materials Handler Supervisor (Warehouse Foreman)	6907	6	SW	\$34,306.69	02-COO-154
1	Fork Lift Operator	5704	6	RW	\$25,134.72	02-COO-155

Supply & Property Management Unit						
1	Supply Technician (General Supply Specialist)	2005	7	EG	\$26,044-33,485	02-COO-157
1	Supply Technician (Office Manager)	2005	7	EG	\$26,044-33,485	02-COO-158
1	Supply Technician	2005	5	EG	\$21,276-27,295	02-COO-160

Chief Operating Officer-Office of Transportation

1	Management and Program Analyst (General Manager)	Senior Executive	EX	\$102,440	02-COO-052
1	Investigation and Compliance Manager	1801	12	EG	\$45,629-58,770 02-COO-053
1	Administrative Officer	0341	12	EG	\$45,629-58,770 02-COO-054
1	Staff Assistant	0301	9	EG	\$31,572-40,680 02-COO-055

Finance and Management Division						
1	Management and Program Analyst	0343	14	EG	\$64,102-82,617	02-COO-056
2	Financial Manager	0505	13	EG	\$54,246-69,906	02-COO-057
1	IT Specialist (Systems Analyst)	2210	12	EG	\$45,629-58,770	02-COO-058
1	Financial Analyst	1160	11	EG	\$38,068-49,038	02-COO-059
1	Staff Assistant	0301	8	EG	\$28,711-36,939	02-COO-060
1	Budget Technician	0560	6	EG	\$23,580-30,254	02-COO-061

Logistics Division						
1	Supervisory Logistics Management Specialist	0346	15	EG	\$72,498-93,441	02-COO-062
1	IT Specialist (Data Management)	2210	13	EG	\$54,246-69,906	02-COO-063
1	Staff Assistant	0301	6	EG	\$28,711-36,939	02-COO-064

Monitoring Division						
1	Monitoring Coordinator	1801	10	EG	\$34,651-44,638	02-COO-064
3	Monitoring Specialist	1801	9	EG	\$31,572-40,680	02-COO-065
4	Accident Investigator	0019	9	EG	\$31,572-40,680	02-COO-066
7	Monitor	1801	7	EG	\$26,044-33,485	02-COO-067
1	Secretary	0318	6	EG	\$23,580-30,254	02-COO-068
5	Telephone Operator	0382	4	EG	\$19,168-24,513	02-COO-069

Planning & Coordination Unit						
1	Logistics Management Specialist	0346	13	EG	\$54,246-69,906	02-COO-070
1	Financial Analyst	1160	12	EG	\$45,629-58,770	02-COO-069A
1	Logistics Specialist	0346	11	EG	\$38,068-49,038	02-COO-072
2	Logistics Specialist	0346	9	EG	\$31,572-40,680	02-COO-073
1	Secretary	0318	6	EG	\$23,580-30,254	02-COO-060A

Fleet Management Division						
1	Supervisory Management and Program Analyst	0343	14	EG	\$64,102-82,617	02-COO-074
1	Staff Assistant	0301	8	EG	\$28,711-36,939	02-COO-060

Safety and Training Academy						
1	Safety & Occupational Health Manager	0018	13	EG	\$54,246-69,906	02-COO-075
1	Safety & Occupational Health Specialist	0018	10	EG	\$34,651-44,638	02-COO-076
1	Training Instructor	1712	10	EG	\$34,651-44,638	02-COO-078A
6	Training Instructor	1712	9	EG	\$31,572-40,680	02-COO-078
1	Secretary	0318	6	EG	\$23,580-30,254	02-COO-060A

Terminal Operations Unit						
1	Logistics Specialist (Terminal Manager)	0346	13	EG	\$54,246-69,906	02-COO-081
4	Logistics Specialist (Terminal Manager)	0346	12	EG	\$45,629-58,770	02-COO-079
16	Logistics Specialist (Assistant Terminal Manager)	0046	10	EG	\$34,651-44,638	02-COO-080
5	Secretary	0318	6	EG	\$23,580-30,254	02-COO-060A
2	Automotive Mechanic	5823	10	RW	\$31,264.06	02-COO-82
7	Telephone Operator	0382	4	EG	\$19,168-24,513	02-COO-065
10	Dispatcher	2151	8	EG	\$28,711-36,939	02-COO-083
5	Timekeeper	0303	7	EG	\$26,044-33,485	02-COO-084
5	Transportation Assistant	2102	6	EG	\$23,580-30,254	02-COO-085

collective bargaining agreement. Where the employee is not represented by the union with exclusive recognition for the unit, no adjustment of a grievance shall be considered as a precedent or as relevant either to the interpretation of the collective bargaining agreement or to the adjustment of other grievances. (1973 Ed., § 1-347.6; Mar. 3, 1979, D.C. Law 2-139, § 1706, 25 DCR 5740; 1981 Ed., § 1-618.6.)

Section references. — This section is referenced in § 1-617.02.
This section is referenced in § 1-617.04.

Legislative history of Law 2-139. — See note to § 1-601.01.

§ 1-617.07. Union security; dues deduction [Formerly § 1-618.7].

Any labor organization which has been certified as the exclusive representative shall, upon request, have its dues and uniform assessments deducted and collected by the employer from the salaries of those employees who authorize the deduction of said dues. Such authorization, costs, and termination shall be proper subjects of collective bargaining. Service fees may be deducted from an employee's salary by the employer if such a provision is contained in the bargaining agreement. (1973 Ed., § 1-347.7; Mar. 3, 1979, D.C. Law 2-139, § 1707, 25 DCR 5740; 1981 Ed., § 1-618.7.)

Legislative history of Law 2-139. — See note to § 1-601.01.

§ 1-617.08. Management rights; matters subject to collective bargaining [Formerly § 1-618.8].

(a) The respective personnel authorities (management) shall retain the sole right, in accordance with applicable laws and rules and regulations:

- (1) To direct employees of the agencies;
- (2) To hire, promote, transfer, assign, and retain employees in positions within the agency and to suspend, demote, discharge, or take other disciplinary action against employees for cause;
- (3) To relieve employees of duties because of lack of work or other legitimate reasons;
- (4) To maintain the efficiency of the District government operations entrusted to them;
- (5) To determine the mission of the agency, its budget, its organization, the number of employees, and the number, types, and grades of positions of employees assigned to an organizational unit, work project, or tour of duty, and the technology of performing its work; or its internal security practices; and
- (6) To take whatever actions may be necessary to carry out the mission of the District government in emergency situations.

(b) All matters shall be deemed negotiable except those that are proscribed by this subchapter. Negotiations concerning compensation are authorized to the extent provided in § 1-617.16. (1973 Ed., § 1-347.8; Mar. 3, 1979, D.C. Law 2-139, § 1708, 25 DCR 5740; 1981 Ed., § 1-618.8.)



Section references. — This section is referenced in § 1-608.01.

This section is referenced in § 1-624.08.

This section is referenced in § 7-1703.02.

Legislative history of Law 2-139. — See note to § 1-601.01.

CASE NOTES

ANALYSIS

Negotiability of issues.

Negotiability of issues.

Trial judge erred by declining to enforce contested portions of arbitration award without making the requisite inquiry into whether school board waived any objections it may have had to the negotiability, and thus arbitrability, of contested issues. *Drivers, Chauffeurs & Helpers Local 639 v. District of Columbia, App. D.C., 631 A.2d 1205 (1993).*

Public employee relations board properly concluded that working hours for school attendance counsellors, as well as certain aspects of

a drug testing program for attendance counselors, were not mandatory subjects of negotiation. *Drivers, Chauffeurs & Helpers Local 639 v. District of Columbia, App. D.C., 631 A.2d 1205 (1993).*

School board was not required to negotiate with union regarding promotions, involuntary transfers and temporary details of employees. *Drivers, Chauffeurs & Helpers Local 639 v. District of Columbia, App. D.C., 631 A.2d 1205 (1993).*

§ 1-617.09. Unit determination [Formerly § 1-618.9].

(a) The determination of an appropriate unit will be made on a case-to-case basis and will be made on the basis of a properly-supported request from a labor organization. No particular type of unit may be predetermined by management officials nor can there be any arbitrary limit upon the number of appropriate units within an agency. The essential ingredient in every unit is community of interest: Provided, however, that an appropriate unit must also be one that promotes effective labor relations and efficiency of agency operations. A unit should include individuals who share certain interests, such as skills, working conditions, common supervision, physical location, organization structure, distinctiveness of functions performed, and the existence of integrated work processes. No unit shall be established solely on the basis of the extent to which employees in a proposed unit have organized; however, membership in a labor organization may be considered as 1 factor in evaluating the community of interest of employees in a proposed unit.

(b) A unit shall not be established if it includes the following:

(1) Any management official or supervisor: Except, that with respect to fire fighters, a unit that includes both supervisors and nonsupervisors may be considered: Provided, further, that supervisors employed by the District of Columbia Board of Education may form a unit which does not include nonsupervisors;

(2) A confidential employee;

(3) An employee engaged in personnel work in other than a purely clerical capacity;

(4) An employee engaged in administering the provisions of this subchapter;

(5) Both professional and nonprofessional employees, unless a majority of the professional employees vote or petition for inclusion in the unit; or

(6) Employees of the Council of the District of Columbia.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
PUBLIC EMPLOYEE RELATIONS BOARD**

TEAMSTERS LOCAL UNION NO. 639, *et al.*,

PERB Case No. 02-U-10

Complainants,

v.

DISTRICT OF COLUMBIA PUBLIC SCHOOLS,

Respondent.

**COMPLAINANTS' MOTION *IN LIMINE* TO
EXCLUDE WITNESSES AND EXHIBITS**

Complainants Teamsters Locals 639 and 730, by their undersigned counsel, hereby move the Hearing Examiner to preclude Respondent District of Columbia Public Schools from presenting witnesses or evidence at the hearing in the above-captioned case scheduled for May 15, 2002. In support of their Motion, Complainants state as follows:

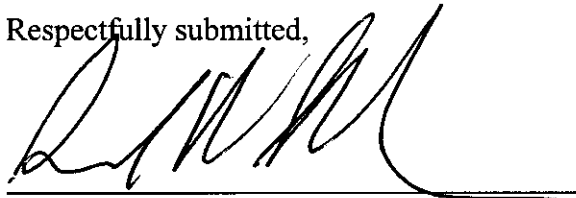
1. On March 22, 2002, PERB issued a Notice of Unfair Labor Practice Hearing scheduling this case for May 15, 2002 at 10:00 a.m.
2. PERB Rule 550.11 unequivocally requires parties to submit a witness list at least five days before the start of a hearing.
3. PERB Rule 550.7 unequivocally requires each party to make every effort to furnish copies of proposed exhibits five days before a hearing.
4. As of May 13, Respondent District of Columbia Public Schools has submitted neither a witness list nor a list of exhibits.
5. The Hearing Examiner has authority to impose procedural sanctions upon parties to serve the interests of justice. The District of Columbia Public Schools should be precluded from

introducing witnesses or exhibits. Its failure to submit witness and exhibit lists has hindered Complainants' ability to prepare cross-examination. *See Chisholm v. AFSCME District Council 20*, PERB Case Nos. 99-U-32 and 99-U-33, Opinion No. 656 (2001).

CONCLUSION

For the reasons stated herein, PERB should preclude Respondent from presenting evidence or witnesses.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. W. Gibson', is written over a horizontal line.

Richard W. Gibson
Jonathan G. Axelrod
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Counsel for the Complainants

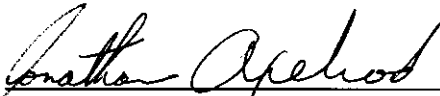
Dated: May 13, 2002

CERTIFICATE OF SERVICE

I hereby certify that one of the foregoing Motion was telecopied and that two copies were mailed, first class, postage prepaid, this 13th day of May, 2002, to:

Melissa Bennett
District of Columbia Public Schools
825 North Capitol Street, N.E.
Washington, DC 20003-4232

Veleter M. B. Mazyck, Esq.
District of Columbia Public Schools
825 North Capitol Street, N.E.
Washington, DC 20003-4232


Jonathan G. Axelrod

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
PUBLIC EMPLOYEE RELATIONS BOARD**

**TEAMSTERS LOCAL UNION NO. 639 a/w
INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, AFL-CIO,**

and

PERB Case No. 02-U-10

**TEAMSTERS LOCAL UNION NO. 730 a/w
INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, AFL-CIO**

Complainants,

v.

DISTRICT OF COLUMBIA PUBLIC SCHOOLS,

Respondent.

ANSWER TO UNFAIR LABOR PRACTICE COMPLAINT

Respondent District of Columbia Public Schools ("DCPS") hereby files the within Answer to the above-captioned Unfair Labor Practice Complaint, and in support thereof states the following:

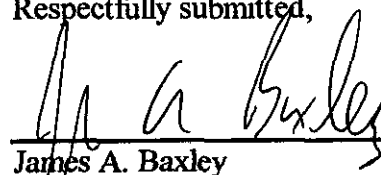
- 1, 2. Admitted.
3. Admitted, except that Veleter M.B. Mazyck's telephone number is 202-442-5000, rather than the phone number stated in the Complaint.
- 4-8. Admitted.
9. The allegations of Paragraph Nine are based solely upon a document (attached to the Complaint as Exhibit "1") and thus need not be either admitted or denied. The document speaks for itself.

10. The allegations of Paragraph Ten are based solely upon a document (attached to the Complaint as Exhibit "2") and thus need not be either admitted or denied. The document speaks for itself.
11. Admitted.
12. The allegations of Paragraph Twelve are based solely upon a document (attached to the Complaint as Exhibit "3") and thus need not be either admitted or denied. The document speaks for itself.
13. Admitted. By way of further response, it is noted that the Complaint was filed on February 6, 2001, only two days after the mailing of the demand for bargaining set forth in the referenced February 4, 2002 letter.
14. The allegations of Paragraph Fourteen constitute a legal conclusion, which need not be admitted or denied. To the extent that a response is required, the allegations are strictly denied. To the contrary, DCPS has not taken any action to remove positions from the bargaining unit or reclassify bargaining unit positions. Because DCPS has not taken any of the alleged actions, it has not refused to bargain in good faith.
15. No response is required to Paragraph Fifteen, as it states the requested remedy.
16. By way of further response, DCPS states the following:
 - a. The proposed "central office transformation plan" approved by the Board of Education on November 16, 2001 has not yet been implemented by DCPS.

- b. The determination of what, if any, bargaining unit positions may be affected by the central office transformation plan has not been made.
- c. There has been no action taken by DCPS that affects either of the Complainants or any of their members.
- d. Because there has been no action by DCPS that affects the Complainants, the Complaint, on its face, fails to allege an unfair labor practice and should be dismissed.
- e. In the alternative, the Complaint fails to allege any dispute that this Board can resolve and the Complaint should be dismissed. The Complaint is clearly premature.

WHEREFORE, in light of the above, the District of Columbia Public Schools respectfully requests that the Complaint be dismissed.

Respectfully submitted,

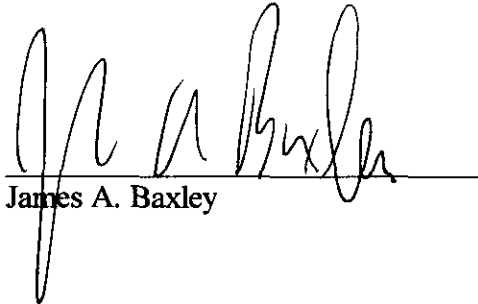
A handwritten signature in black ink, appearing to read "James A. Baxley", is written over a horizontal line.

James A. Baxley
Deputy General Counsel
District of Columbia Public Schools

CERTIFICATE OF SERVICE

I hereby certify that two copies of the foregoing Answer to Unfair Labor Practice Complaint were served via facsimile on the 26th day of February, 2002, and were mailed, first class postage prepaid, this 28th day of February 2002, to:

Jonathan G. Axelrod, Esquire
Beins, Axelrod & Kraft, PC
Suite 704
1717 Massachusetts Ave, N.W.
Washington, DC 20036-2001



James A. Baxley

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
PUBLIC EMPLOYEE RELATIONS BOARD**

**TEAMSTERS LOCAL UNION NO. 639 a/w
INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, AFL-CIO,**

and

PERB Case No. 02-U-10

**TEAMSTERS LOCAL UNION NO. 730 a/w
INTERNATIONAL BROTHERHOOD OF
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Complainants,

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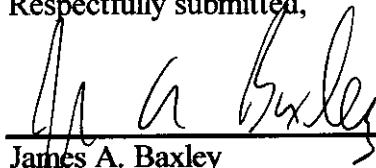
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Respectfully submitted,



James A. Baxley
Deputy General Counsel
District of Columbia Public Schools

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
PUBLIC EMPLOYEE RELATIONS BOARD**

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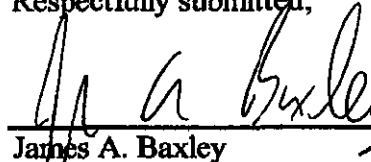
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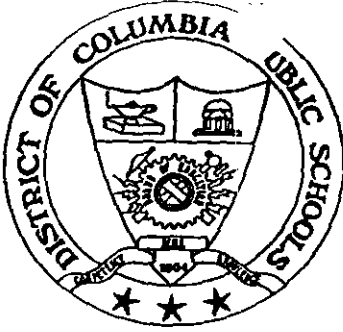
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- d. Because there has been no action by DCPS that affects the Complainants, the Complaint, on its face, fails to allege an unfair labor practice and should be dismissed.
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WHEREFORE, in light of the above, the District of Columbia Public Schools respectfully requests that the Complaint be dismissed.

Respectfully submitted,



James A. Baxley
Deputy General Counsel
District of Columbia Public Schools



Office of the General Counsel
9th Floor
825 North Capitol St., NE
Washington, DC 20002
(202) 442-5000
Fax (202) 442-5098

FACSIMILE

TO: Julio A. Castillo Date: 2/26/02
CO: Public Employee Relations Board Fax. No.: 727-9116
FROM: James Bailey SN Tele. No.: _____
Tele. No.: (202) 442-5000
No. Pages, Including Cover Sheet: 5

COMMENTS: Re; PERB Case No. 02-4-10

CONFIDENTIALITY NOTICE

The information contained in this telefacsimile is transmitted by an attorney. It is privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If this communication has been received in error, please notify us immediately by telephone, and return the original message to us at the above address via first class prepaid US postage. Thank you.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
PUBLIC EMPLOYEE RELATIONS BOARD**

**TEAMSTERS LOCAL UNION NO. 639 a/w
INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, AFL-CIO,**

and

PERB Case No. 02-U-10

**TEAMSTERS LOCAL UNION NO. 730 a/w
INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, AFL-CIO,**

Complainants,

v.

DISTRICT OF COLUMBIA PUBLIC SCHOOLS,

Respondent.

RECEIVED
FEB 13 AM 10 10
PERB

UNFAIR LABOR PRACTICE COMPLAINT

Complainants Teamsters Locals 639 and 730, by their undersigned counsel, hereby file the following unfair labor practice complaint against the District of Columbia Public Schools. Complainants allege and state as follows:

PARTIES

1. Complainant Drivers, Chauffeurs and Helpers Local Union No. 639 affiliated with the International Brotherhood of Teamsters, AFL-CIO ("Local 639") is a labor organization within the meaning of the CMPA. Local 639 maintains its principal office at 3100 Ames Place NE, Washington, DC 20018 (202-636-8170). John Catlett is the President and principal officer of Local 639.

2. Complainant Warehouse Employees Local Union No. 730 affiliated with the International Brotherhood of Teamsters, AFL-CIO ("Local 730") is a labor organization within the meaning of the CMPA. Local 730 maintains its principal office at 2001 Rhode Island Ave. NE, Washington, DC 20018 (202-529-3434). Archie Smith is the President and principal officer of Local 730.

3. Respondent District of Columbia Public Schools ("Public Schools") maintains its principal office at 825 North Capitol St., N.E., Washington, DC 20002. The Public Schools is an employer within the meaning of the CMPA and has the authority to negotiate and execute collective bargaining agreements with labor organizations concerning wages and other terms and conditions of employment. The Superintendent's telephone number is 202-442-5885. The Director of Labor Management and Employee Relations position is currently vacant. The Public Schools' General Counsel and Chief Negotiator is Veleter M.B. Mazyck. Her telephone number is 202-422-5373.

4. On June 24, 1986, Local 639 and Local 730 (collectively referred to herein as "the Union") were jointly certified by the Public Employee Relations Board ("PERB") as the exclusive bargaining agent for Public School employees in the following five bargaining units: Operating Engineers Unit, Custodian Unit, Transportation and Warehouse Service Unit, Cafeteria Managers Unit and Cafeteria Workers Unit. PERB Certification Nos. 35-39.

5. On March 9, 1988, PERB certified Local 639 as the exclusive bargaining agent for Public School employees in a Maintenance Unit. PERB Certification No. 47. This unit was consolidated with the Custodian Unit. PERB Certification No. 50.

6. On October 6, 1989, PERB certified Local 639 as the exclusive bargaining agent for Public School employees in the Attendance Counselors Unit. PERB Certification No. 52.

7. On March 28, 1990, PERB certified Local 639 as the exclusive bargaining agent for RW and SW employees in the Supply Management Branch, Equipment Maintenance Unit of the Public Schools. PERB Certification No. 60.

8. The Union and the Public Schools have been parties to a continuous collective bargaining relationship, embodied in various collective bargaining agreements, covering the Operating Engineers Unit, Custodian Unit, Transportation and Warehouse Service Unit, Cafeteria Managers Unit and Cafeteria Workers Unit. After its certification, the Union initially adopted a collective bargaining agreement negotiated between the Public Schools and a predecessor union. Subsequently, the Union and the Public Schools entered into a collective bargaining agreement for the period 1987-1990, a collective bargaining "agreement" for the period 1990-1993, an "agreement" for the period 1993-1996, which remains in effect pending its renegotiation, and an interest arbitration award amending the 1993-1996 "agreement" to provide wage increases for 1996-2000. True and correct copies of the 1993-1996 Agreement and the 1996-2000 Interest Arbitration Award are on file with PERB.

EVENTS CULMINATING IN THE INSTANT COMPLAINT

9. On November 16, 2001, the Board of Education Conducted a Special Meeting. The Board unanimously approved "the Superintendent's central office transformation plan." The Executive Summary reveals that employees in the Operating Engineers Unit and the Custodian Unit will have their positions abolished, that the Board and an outside contractor will issue new position descriptions, that each affected employee will have to apply to retain his/her job, and that employees

not “selected for new positions” will be terminated. A true and correct copy of the Action Sheet and Executive Summary is attached hereto as Complaint Exhibit 1.

10. On January 18, 2002, Local 639 President John Catlett wrote Superintendent Paul L. Vance concerning rumors concerning the plan to reorganize. Mr. Catlett asserted that the “just cause” provision in the Collective Bargaining Agreement prohibited terminations without cause and that the unilateral change in bargaining unit work violated the Comprehensive Merit Personnel Act. A true and correct copy of Local 639’s January 18, 2002 letter is attached hereto as Complaint Exhibit 2.

11. Neither Superintendent Vance nor the Public Schools responded to Mr. Catlett’s letter.

12. On February 4, 2002, Local 639 requested the Public Schools to provide information concerning the transformation and to bargain over the decision and its impact on bargaining unit employees. A true and correct copy of Local 639’s February 4, 2002 letter is attached hereto as Complaint Exhibit 3.

13. The Schools have not yet responded to the Union’s February 4, 2002 letter.

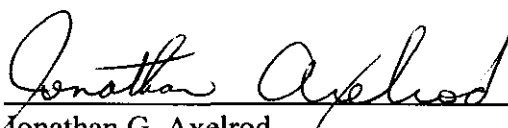
14. By removing positions from the bargaining unit without bargaining with the Union, and by reclassifying bargaining unit positions without negotiating with the Union, the Public Schools has refused to bargain in good faith in violation of the CMPA, D.C. Code §1-618.4(a)(1) and (5).

15. To remedy these violations, PERB must order the Public Schools to:

a) cease and desist from unilaterally altering the agreed-upon bargaining units.

- b) cease and desist from reclassifying bargaining unit positions and requiring incumbent employees to apply for positions and face termination if they are not selected.
- c) make whole any employee discharged pursuant to the "transformation."
- d) bargain with the Union about the "transformation" and its impact on bargaining unit employees.
- e) take such other actions as PERB feels are appropriate to remedy the violation.

Respectfully submitted,


Jonathan G. Axelrod
Beins, Axelrod & Kraft, P.C.
1717 Massachusetts Avenue, N.W. Suite 704
Washington, D.C. 20036-2001
202-328-7222
202-328-7030 (telecopier)

Counsel for the Complainants

Dated: February 6, 2002

AFFIRMATION

I swear that the foregoing Unfair Labor Practice Complaint is true and correct to the best of my knowledge and belief.



John Catlett
President, Teamsters Local 639

**DISTRICT OF COLUMBIA BOARD OF EDUCATION****825 NORTH CAPITOL STREET, N.E.****WASHINGTON, DC. 20002****TELEPHONE (202) 442-4289 FAX (202) 442-5198****ACTION SHEET****Special Meeting****of the****District of Columbia Board of Education****825 North Capitol Street, N.E.****Fifth Floor Board Room****Friday, November 16, 2001****2:30 P.M.*****By voice vote, the Board of Education:***

- **approved** unanimously a motion that the Board of Education waive Board Rule 105.2 to enable the Board to hold its November stated meeting on Thursday, November 29, 2001, at 5:30 p.m.;
- **approved** unanimously a motion that the Board of Education approve an FY 2002 D.C. Public Schools (DCPS) capital budget adjusted downward from its original level of \$220 million to its current level of \$174 million;
- **approved** unanimously a motion that the Board of Education approve an FY 2003 DCPS capital budget request in the amount of \$327.5 million; and
- **approved** unanimously a motion that the Board of Education approve the Superintendent's central office transformation plan.

EXECUTIVE SUMMARY

CONFIDENTIAL
DRAFT 11-14-01

1. To improve central support to schools, DCPS will reorganize its central office around four primary goals:
 - Increased responsiveness to schools and community
 - Heightened focus on academics
 - Performance oriented and accountable central staff
 - Save money by improving central staff efficiency, allowing more funds for direct support of student achievement
2. DCPS will make several changes in the central administration's organization structure:
 - Reorganize reporting relationships to maximize support to schools
 - Restructure and streamline central functions, starting with top and middle management and proceeding throughout the entire central office organization.
 - Launch a basic performance management system to hold program managers accountable for budget management and strategic goals
3. Making these changes will help DCPS achieve the four goals mentioned above, while saving approximately \$17.3 million annually (\$14.0m for 9 months)
 - ✓ DCPS will provide outplacement services for those employees who are not selected for positions in the new central office organization
4. After successfully completing the initial reorganization in FY 2002, DCPS will undertake several additional organization-related activities that are essential to meeting the goals of the Business Plan for Strategic Reform. These include
 - Build the new office of Institutional Advancement
 - Build on the performance management system launched in the first year

CENTRAL TRANSFORMATION: TIMING AND PROCESS**CONFIDENTIAL**
DRAFT 11-14-01

- **By November 16:**
With Board approval, complete procurement from the GSA schedule to work with central office programmatic units to develop position descriptions, qualification requirements, and performance standards for new organizational/functional structure
- **November 21**
Announce organizational structure, contractor role in developing new position descriptions, timeline and process for completing transformation
- **December 10:**
Abolish all existing central office positions, and issue RIF notices to all central office employees to be effective January 11. Announce career placement services to be available to DCPS employees who face termination - working in conjunction with DCOP, Department of Employment Services and the U.S. Department of Labor
- **December 10 through December 21**
New positions/qualifications announced internally and externally
- **By January 4**
Complete assessment of applicants and make selection decisions
- **January 11**
Terminate employees not selected for new positions, with severance pay if applicable

Drivers, Chauffeurs and Helpers
Local Union No. 639

TEAMSTERS 639 CENTER

3100 Ames Place, N.E. • Washington, D.C. 20018

Affiliations: International Brotherhood of Teamsters,
Teamsters Joint Council No. 55

Telephone: (202) 636-8170

FAX: (202) 529-9382

E-Mail: Tlocal639@aol.com



JOHN D. CATLETT
President

RONALD E. ROSS
Vice President

JOHN C. STEGER
Secretary-Treasurer

JAMES F. WOODWARD
Recording Secretary

January 18, 2002

SENT VIA FACSIMILE & CERTIFIED MAIL P 482 058 579

Dr. Paul L. Vance
Superintendent
District of Columbia Schools
825 North Capitol Street, N.E.
Washington, D.C. 20003

Re: DCPS "Restructuring"

Dear Dr. Vance:

I have been informed, mainly through rumors, that there is a plan to "reorganize" and Teamster DCPS employees will be required to reapply for their jobs. This is supposedly being done to respond to the newly discovered deficit.

Please be advised that DCPS has a labor agreement with Teamsters Locals 639/730. DCPS must have just cause to terminate an employee. The act of requiring employees to reapply is a termination of employment.

Furthermore, any change in bargaining unit work is a mandatory subject at bargaining. A unilateral change of bargaining unit positions is an unfair labor practice. As you are aware, Teamsters Locals 639/730 are in contract negotiations now and have tentatively agreed on restructuring bargaining unit classifications.


DCPS Teamster workers did not cause any part of the deficit, and I can assure you that Teamsters Locals 639/730 will use all means necessary to oppose any attempt to RIF needed school employees and will not agree that DCPS Teamsters have to reapply to keep working at DCPS.

Dr. Paul L. Vance
January 18, 2002
Page Two

To pursue this reorganization plan will be counter productive and take time and energy away from your goal of improving DCPS, a goal that we share.

As I have said many times before, the Teamsters will support every effort to obtain full funding for DCPS. Let us work together toward that goal.

Sincerely,



John D. Catlett
President

cc: Mr. Archie Smith
Ms. Peggy Cooper Cafritz
Ms. Veleter M.B. Mazyck

Drivers, Chauffeurs and Helpers
Local Union No. 639

TEAMSTERS 639 CENTER

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JOHN D. CATLETT
President

RONALD E. ROSS
Vice President

JOHN C. STEGER
Secretary-Treasurer

JAMES F. WOODWARD
Recording Secretary

February 4, 2002

VIA FAX AND CERTIFIED MAIL – 7000 1503 0003 0509 0449

Veleter M.B. Mazyck, Esq.
General Counsel
DC Public Schools
825 N. Capitol Street, NE – 9th Floor
Washington, DC 20002-4232

Dear Ms. Mazyck:

As we have discussed, Local #639 and Local #730 are concerned about the Superintendent's "transformation" plan adopted by the Board of Education on November 16, 2001. I have written to Superintendent Vance but have yet to receive a response.

Please consider this a formal request to negotiate over the planned changes in the definition of the bargaining unit. As you know, an employer violates the CMLPA by unilaterally changing the definition of the bargaining unit. The re-titling of bargaining unit positions can occur only by agreement of the parties or by a PERB decision. Assuming, arguendo, that DCPS can lawfully impose the "transformation" unilaterally, the Union seeks to negotiate over its impact on bargaining unit employees. We will propose such topics as the continuation of pay and benefits, assistance in relocating employees to other positions in the District of Columbia government and positions in the private sector and other forms of outplacement counseling.

We hope to begin bargaining shortly after we receive the following documents, which we believe are necessary to properly understand and evaluate the Superintendent's plan:

Veleter M.B. Mazyck, Esquire

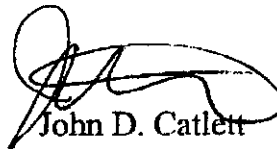
February 4, 2002

Page 2

- A complete copy of the "transformation" document and all supporting materials that discuss the "transformation" with respect to bargaining unit positions.
- A copy of all requests for proposals (RFP) issued seeking contractors to assist the Board in the reclassification process or to perform other duties in connection with the "transformation."
- A copy of all contracts issued in response to the RFP identified above.
- Copies of all new position descriptions and the position descriptions they replace.
- Copies of all documents used or to be used in determining whether current bargaining unit employees are qualified for appointment to the "new" positions.

Thank you for your prompt attention and immediate response.

Sincerely,



John D. Catlett
President

JDC/vrr

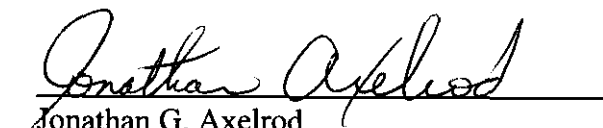
cc: Archie Smith, President, Teamsters Local #730

mazyck3.ltr

CERTIFICATE OF SERVICE

I hereby certify that two copies of the foregoing Complaint were mailed, first class, postage prepaid, this 6th day of February 2002, to:

Veletor M.B. Mazyck, Esq.
District of Columbia Public Schools
825 North Capitol Street, N.E.
Washington, DC 20003-4232


Jonathan G. Axelrod